



dollars in contributions to Georgia state legislators, or expenditures to a campaign consultant, who shortly thereafter made contributions—often in the exact same amounts—to Rep. Carter's federal campaign committee:

- On May 23, 2013, Millar for State Senate, the Georgia state campaign committee of Fran Miller, contributed \$1,000 to the Federal Committee.<sup>3</sup> On April 5, 2014, Fran Miller's campaign committee received a \$1,000 contribution from State Committee.<sup>4</sup>
- On June 21, 2013, State Committee gave \$1,000 to Loudermilk for Congress.<sup>5</sup> Four days later, on June 25, 2013, Rep. Loudermilk's own nonfederal campaign committee, Loudermilk for State Senate, gave the Federal Committee \$1,000.<sup>6</sup>
- On June 28, 2013, Georgia state representative Ron Stephens contributed \$2,600 to the Federal Committee.<sup>7</sup> On December 3, 2014, State Committee contributed \$1,000 to Stephens' reelection campaign.<sup>8</sup>
- On July 10, 2013, Georgia state senator Jeff Mullis contributed \$500 to the Federal Committee.<sup>9</sup> On April 9, 2014, State Committee contributed \$1,000 to Mullis's campaign committee.<sup>10</sup> On April 22, 2014, Mullis contributed an additional \$500 to the Federal Committee, so that his total contributions to the Federal Committee for the 2014 cycle were \$1,000.<sup>11</sup>
- On August 12, 2013, Neal Florence, a candidate for the Georgia House, contributed \$500 to the Federal Committee.<sup>12</sup> On January 17, 2014, State Committee contributed \$1,000 to Friends of Neal Florence, Florence's state

<sup>3</sup> Buddy Carter for Congress, July Quarterly FEC Report at 61 (Sep. 4, 2013), <http://docquery.fec.gov/cgi-bin/fecimg/?13964583261>.

<sup>4</sup> Friends of Buddy Carter for Senate, Georgia Campaign Contribution Disclosure Report at 6 (July 3, 2014), [http://media.ethics.ga.gov/search/Campaign/Campaign\\_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=110386](http://media.ethics.ga.gov/search/Campaign/Campaign_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=110386).

<sup>5</sup> Loudermilk for Congress, July Quarterly FEC Report at 48 (July 15, 2013), <http://docquery.fec.gov/cgi-bin/fecimg/?13941142142>.

<sup>6</sup> Buddy Carter for Congress, July Quarterly FEC Report at 61 (Sept. 4, 2013), <http://docquery.fec.gov/cgi-bin/fecimg/?13964583261>.

<sup>7</sup> Buddy Carter for Congress, July Quarterly FEC Report at 47 (Sept. 4, 2013), <http://docquery.fec.gov/cgi-bin/fecimg/?13964583247>.

<sup>8</sup> Friends of Buddy Carter for Senate, Georgia Campaign Contribution Disclosure Report at 5 (Jan. 2, 2015), [http://media.ethics.ga.gov/search/Campaign/Campaign\\_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=114123](http://media.ethics.ga.gov/search/Campaign/Campaign_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=114123).

<sup>9</sup> Buddy Carter for Congress, October Quarterly FEC Report at 29 (Jan. 1, 2014), <http://docquery.fec.gov/cgi-bin/fecimg/?14960015609>.

<sup>10</sup> Friends of Buddy Carter for Senate, Georgia Campaign Contribution Disclosure Report at 6 (July 3, 2014), [http://media.ethics.ga.gov/search/Campaign/Campaign\\_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=110386](http://media.ethics.ga.gov/search/Campaign/Campaign_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=110386).

<sup>11</sup> Buddy Carter for Congress, Pre-Primary FEC Report at 19 (June 23, 2014), <http://docquery.fec.gov/cgi-bin/fecimg/?14941627954>.

<sup>12</sup> Buddy Carter for Congress, October Quarterly FEC Report at 15 (Jan. 14, 2014), <http://docquery.fec.gov/cgi-bin/fecimg/?14960015595>.

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- In its July 4, 2016 Georgia campaign finance report, State Committee disclosed a \$1,000 contribution to the Federal Committee dated May 20, 2016 and a \$500 contribution to “Friends of Bruce Broadrick” (sic), the campaign committee of Georgia state House candidate Bruce Broadrick, dated May 25, 2016.<sup>22</sup> State Committee amended its Georgia campaign finance report on July 15, 2016 to report instead a \$500 campaign contribution to Broadrick dated May 20, 2016 and another \$1,000 contribution to Broadrick’s campaign dated May 25, 2016.<sup>23</sup> On July 14, 2016, Bruce Broadrick contributed \$1,000 to the Federal Committee.<sup>24</sup> The Federal Committee reported no May 2016 contribution from State Committee.<sup>25</sup>

Federal Election Commission regulations prohibit the transfer of funds from a candidate’s campaign committee or account for a nonfederal election to his principal campaign committee for a federal election.<sup>26</sup> Rep. Carter and his political allies have apparently engaged in a knowing and willful criminal scheme to sidestep this prohibition by having State Committee transfer funds to the Federal Committee through conduit contributions made in the name of Millar for State Senate, Loudermilk for State Senate, Ron Stephens, Jeff Mullis, Neal Florence, David Simons, Ellis Black, and Bruce Broadrick. (In fact, State Committee appears to have inadvertently revealed the scheme in its July 4, 2016 Georgia filing, which reported a \$1,000 contribution to the Federal Committee that was later erased from the record in the July 11, 2016 amended filing—a filing listing the \$1,000 expenditure as a contribution to Friends of Bruce Broadrick.<sup>27</sup>) It is illegal to make or knowingly accept contributions in the name of another.<sup>28</sup> That prohibition applies both to “false name” contributions (contributions made in another’s name without his/her consent) and to “straw donor” contributions like those received by the Federal Committee, in which a contributor is reimbursed by another for his/her contribution.<sup>29</sup>

The apparent conduit contributions are also impermissible spending of soft money to influence a federal election. It is a violation of the Federal Election Campaign Act of 1971 for a federal candidate to “spend” funds in connection with a federal election unless the funds are subject to

<sup>22</sup> Friends of Buddy Carter for Senate, Georgia Campaign Contribution Disclosure Report at 5 (July 4, 2016), [http://media.ethics.ga.gov/search/Campaign/Campaign\\_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=121244](http://media.ethics.ga.gov/search/Campaign/Campaign_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=121244).

<sup>23</sup> Friends of Buddy Carter for Senate, Georgia Campaign Contribution Disclosure Report at 5 (July 15, 2016), [http://media.ethics.ga.gov/search/Campaign/Campaign\\_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=121873](http://media.ethics.ga.gov/search/Campaign/Campaign_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=121873).

<sup>24</sup> Buddy Carter for Congress, October Quarterly FEC Report at 15 (Oct. 14, 2016), <http://docquery.fec.gov/cgi-bin/fecimg/?201610149032497518>.

<sup>25</sup> See Buddy Carter for Congress, July Quarterly FEC Report (July 15, 2016), <http://docquery.fec.gov/pdf/541/201607159020558541/201607159020558541.pdf>.

<sup>26</sup> 11 C.F.R. § 110.3(d).

<sup>27</sup> Compare Friends of Buddy Carter for Senate, Georgia Campaign Contribution Disclosure Report at 5 (July 4, 2016), [http://media.ethics.ga.gov/search/Campaign/Campaign\\_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=121244](http://media.ethics.ga.gov/search/Campaign/Campaign_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=121244) with Friends of Buddy Carter for Senate, Georgia Campaign Contribution Disclosure Report at 5 (July 15, 2016), [http://media.ethics.ga.gov/search/Campaign/Campaign\\_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=121873](http://media.ethics.ga.gov/search/Campaign/Campaign_ReportOptions.aspx?NameID=818&FilerID=C2009000001&CDRID=121873).

<sup>28</sup> 52 U.S.C. § 30122; see also 11 C.F.R. § 110.4.

<sup>29</sup> United States v. O'Donnell, 608 F.3d 546, 549, 553 (9th Cir. 2010).

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the Act's limitations, prohibitions, and reporting requirements.<sup>30</sup> Georgia permits corporate contributions to state campaign committees that would not be permissible under federal law.<sup>31</sup> Here, there is no evidence that State Committee's conduit contributions were subject to an accounting analysis that limited them to federally permissible funds. Thus, Carter has allegedly directed money outside of federal source and amount restrictions from State Committee to his federal campaign committee.

Rep. Carter's state campaign committee also spent more than \$26,000 on advertising, political consulting, and sponsoring political meetings after Carter announced he would not seek reelection to the state senate and would instead pursue federal office.<sup>32</sup> The questionable expenditures ran from May 2013 to September 2014, covering nearly the entire primary and general election of the 2014 cycle.<sup>33</sup> There is no evidence that the expenditures were made using federally permissible funds determined using a reasonable accounting method. Thus, it appears that Carter was spending his state campaign committee's soft money in violation of 52 U.S.C. § 30125(e)(1).<sup>34</sup>

Rep. Carter's apparent conduit contribution scheme undermines the anticorruption objectives of federal campaign contribution source and amount restrictions. In order to safeguard the integrity of the electoral process, I respectfully request that you undertake a full investigation of this matter and promptly take all other steps to seek appropriate judicial relief.

Sincerely,

*Lisa M. Ring*  
Lisa M. Ring

Richmond Hill, GA 31324

SUBSCRIBED AND SWORN to before me this 4<sup>th</sup> day of May, 2017.

*[Signature]*  
Notary Public

My Commission Expires:

June 11 2019



<sup>30</sup> 52 U.S.C. § 30125(e)(1)(A).

<sup>31</sup> See Ga. Code Ann. § 21-5-41; 52 U.S.C. § 30118.

<sup>32</sup> See Georgia Government Transparency and Campaign Finance Comm'n, Search Results for Expenditures of Friends of Buddy Carter for Senate, [http://media.ethics.ga.gov/search/Campaign/campaign\\_ByExpendituressearchresults.aspx?Name=&ExpTypeID=0&OccEmp=&Purpose=&From=05/03/2013&To=03/31/2017&Item=&Paid=&Filer=&Candidate=&Committee=Friends%20of%20Buddy%20Carter%20for%20Senate](http://media.ethics.ga.gov/search/Campaign/campaign_ByExpendituressearchresults.aspx?Name=&ExpTypeID=0&OccEmp=&Purpose=&From=05/03/2013&To=03/31/2017&Item=&Paid=&Filer=&Candidate=&Committee=Friends%20of%20Buddy%20Carter%20for%20Senate). (An additional table of these expenditures is included in Appendix A.)

<sup>33</sup> *Id.*

<sup>34</sup> See FEC Advisory Opinion 2016-25 (Mike Pence for Indiana).

**Appendix A**

**State Committee Expenditures After Carter Declared His Congressional Candidacy in May 2013**

<b>Friends of Buddy Carter for Senate Expenditures on Advertising, Newsletters, and Social Media</b>			
<b>Recipient</b>	<b>Amount</b>	<b>Date</b>	<b>Purpose</b>
Landmark Communications	\$8,979.00	7/1/2014	Newsletter production
Monroe Marketing	\$3,063.40	3/24/2014	Advertising
The Georgia Peace Officer	\$200.00	7/15/2013	Advertisement
Landmark Communications	\$8,904.42	5/3/2013	Newsletter production and delivery
Newsblasters	\$697.00	5/1/2013	Twitter, facebook support
<b>TOTAL:</b>	<b>\$21,843.82</b>		

<b>Friends of Buddy Carter for Senate Expenditures Sponsoring Political Meetings</b>			
<b>Recipient</b>	<b>Amount</b>	<b>Date</b>	<b>Purpose</b>
Chatham County Republican Party	\$1,250.00	9/16/2014	Annual meeting sponsorship
Memorial Day Festival Committee	\$250.00	4/28/2014	Sponsorship
Leadership Georgia	\$500.00	4/16/2014	Sponsorship
Skidaway Island Republican Club	\$250.00	2/10/2014	Banquet table sponsorship
Republican Leadership Georgia	\$250.00	11/8/2013	Sponsorship
Carter's Pharmacy, Inc	\$549.00	7/12/2013	NCSL Registration fee
<b>TOTAL:</b>	<b>\$3,049.00</b>		

<b>Friends of Buddy Carter for Senate Expenditures on Consulting Fees</b>			
<b>Recipient</b>	<b>Amount</b>	<b>Date</b>	<b>Purpose</b>
Simons and Associates	\$1,000.00	3/10/2014	Consulting
Simons and Associates	\$500.00	12/24/2013	Consulting fees
Simons and Associates	\$500.00	11/1/2013	Consulting fees
Simons and Associates	\$250.00	11/1/2013	Consulting fees
Simons and Associates	\$250.00	7/1/2013	Consulting fees
<b>TOTAL:</b>	<b>\$2,500</b>		

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